

Attachment D

PG&E's Comments on the North Fork Feather River Listing for Polychlorinated biphenyls (PCBs)

WATER SEGMENT:	North Fork Feather River below Lake Almanor (The 2008 proposed listing includes the entire 56+ mile stretch – without any segmentation)
POLLUTANT:	PCBs
SOURCES:	Source Unknown
STATUS of Proposed 2008 303(d) LISTING:	List (2006 decision was Do Not List)
CVRWQCB STAFF BASIS:	After review of the available data and information, Central Valley Regional Water Quality Control Board (CVRWQCB) staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.
PG&E RECOMMENDATION:	Revise listing as follows: <u>List NFFR Belden Reach (between Belden Forebay and Belden Powerhouse);</u> <u>List Poe Reach (Poe Reservoir only); and</u> <u>List NFFR Big Bend Reach (Big Bend Reservoir only);</u> <u>Do Not List any other NFFR reaches.</u>
PG&E COMMENT:	<p>The CVRWQCB listed the entire NFFR below Lake Almanor in the Seneca Reach through the Big Bend Reach to Lake Oroville due to exceedances of Office of Environmental Health Hazard Assessment (OEHHA) PCB criterion (June 2008), which only occurred in samples collected from the NFFR in the Belden Reach, in the Poe Reach (Poe Reservoir), and the Big Bend Reach (Big Bend Reservoir). There are no known PCB data available below Lake Almanor in Seneca Reach, Rock Creek Reach, Cresta Reach, or the Poe Reach below Poe Reservoir.</p> <p>Arguments provided by PG&E in the Water Segment Delineation Factsheet (Attachment A) explain the necessity for determining appropriateness of listing or delisting based upon water segmentation of long rivers with regard to environmental, biological, and physical differences per recommendations set forth by the U.S. Environmental Protection Agency (US EPA) in 2006 (US EPA 2006). Figure D-1 depicts the segmentation as described in Attachment A. PG&E believes that the TMDL process will be more reflective of current conditions and truly impaired water segments may be</p>

addressed more efficiently if water segment delineation were followed when determining the list of 303(d) impaired waters.

In addition, listing of water segments should be based upon the location of the available data, which in this case is from the Belden Reach (Belden Forebay, the NFFR below Belden Dam, and the NFFR below the dredge disposal site); the Poe Reach (in Poe Reservoir only); and the Big Bend Reach (below Poe Powerhouse in Big Bend Reservoir only). There are no known data and therefore, there is no justification in favor of placing the NFFR below Lake Almanor in the Seneca Reach, Rock Creek Reach, Cresta Reach, or Poe Reach below Poe Reservoir on the section 303(d) list for impaired waterbodies.

PG&E has provided factsheets for each reach of the NFFR (Seneca, Belden, Rock Creek, Cresta, Poe, and Big Bend) in this submission. Factsheets for Seneca Reach, Rock Creek Reach, and Cresta Reach demonstrate that these reaches should not be listed for PCBs because no data is available to make a determination regarding listing. The factsheets for Belden Reach, Poe Reach (in Poe Reservoir specifically), and Big Bend Reach (Big Bend Reservoir specifically) demonstrate that there are data available, which indicate possible impairment due to PCBs and therefore support listing in these water segments only.

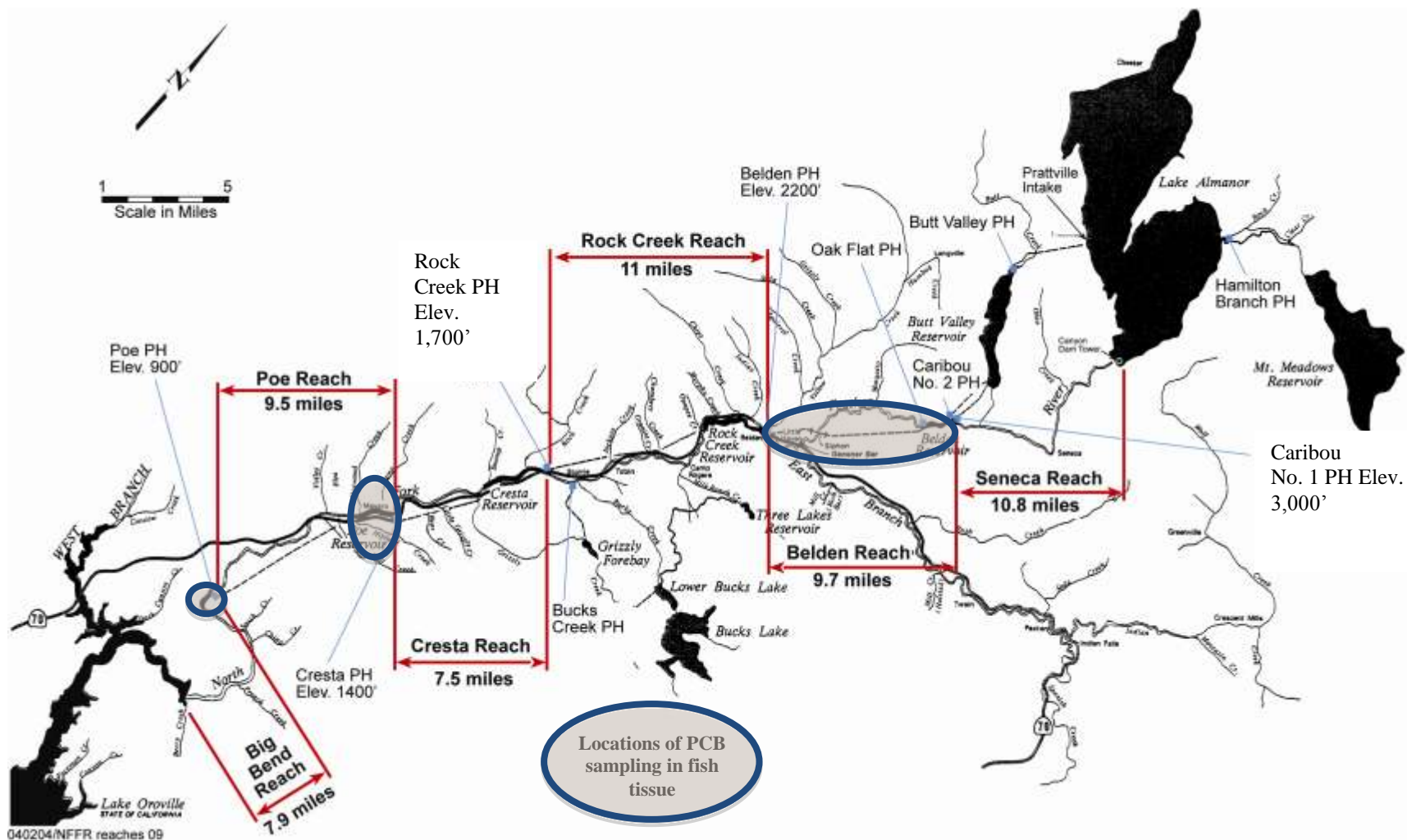


Figure D-1. Water Segment Delineation and Actual Sampling Locations in the NFFR for PCBs (PG&E data 2001, 2002, and 2003), (Belden Forebay, NFFR below Belden Dam, NFFR below dredge disposal site, Poe Reach in Poe Reservoir only, and Big Bend Reach below Poe Powerhouse in Big Bend Reservoir)

FACTSHEETS

**EVALUATION OF NORTH FORK FEATHER RIVER
BY SEGMENT OR REACH**

WATER SEGMENT: North Fork Feather River – Seneca Reach (between Canyon Dam and Caribou 1 and 2 powerhouses)

POLLUTANT: PCBs

SOURCES: None; no known data or evidence available

**STATUS of Proposed
2008 303(d) LISTING:** Listed

**CVRWQCB
STAFF BASIS:** After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**PG&E
RECOMMENDATION:** Do Not List

PG&E COMMENT: There are no known available PCB data for the North Fork Feather River (NFFR) Seneca Reach between Lake Almanor (Canyon Dam) and the Caribou Powerhouses 1 and 2; consequently, there is no justification for listing this river segment for PCBs.

WATER SEGMENT: North Fork Feather River – Belden Reach (Belden Forebay to Belden Powerhouse)

POLLUTANT: PCBs

SOURCES: Source Unknown

STATUS of Proposed 2008 303(d) LISTING: Listed

CVRWQCB STAFF BASIS: After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

PG&E RECOMMENDATION: List

PG&E COMMENT: Data were collected by PG&E in 2001 for PCB analysis in fish and crayfish tissue from Belden Forebay (7 fish sampled, 1 crayfish sampled) and from the North Fork Feather River (NFFR) below Belden Dam (8 fish sampled and 1 crayfish sampled), (PG&E 2002). A total of 6 of 7 fish from Belden Forebay and 7 of 8 fish from below Belden Dam exceeded the OEHHA PCB criterion (3.6 ppb) for the protection of human health. None of the crayfish samples exceeded the criterion.

Data were collected by PG&E in 2002 for PCB analysis in fish from Belden Forebay (15 fish sampled); and from the NFFR below the dredge disposal site (12 fish sampled), (PG&E 2003). A total of 5 of 15 fish from Belden and 2 of 12 fish from the NFFR below the dredge disposal site exceeded the OEHHA PCB criterion (3.6 ppb) for the protection of human health.

Therefore, for the sample years 2001 and 2002, 20 of 44 samples exceeded the OEHHA PCB criterion (3.6 ppb) for protection of human health and this exceeds the allowable frequency in Table 3.1 of the State Water Resources Control Board (SWRCB) Listing Policy (SWRCB 2004).

References

Klasing, Susan & Brodberg, Robert. 2008. *Development of Fish Contaminant Goals and Advisory Tissue Levels for Common Contaminants in California Sport Fish: Chlordane, DDTs,*

Dieldrin, Methylmercury, PCBs, Selenium, and Toxaphene. Pesticide and Environmental Toxicology Branch, Office of Environmental Health Hazard Assessment (OEHHA), California

Pacific Gas and Electric Company (PG&E). 2002. Upper North Fork Feather River Project (FERC 2105), *Final Application for License for the Upper North Fork Feather River (UNFFR) Project*. October 2002.

PG&E. 2003. Poe Hydroelectric Project (FERC 2107), *Final Application for License for the Poe Project (FERC 2107)*. December 2003.

State Water Resources Control Board (SWRCB). 2004. *Water Quality Control Policy (Listing Policy) for Developing California's Clean Water Act Section 303(d) List*. September 2004.

WATER SEGMENT:	North Fork Feather River – Rock Creek Reach (Rock Creek Reservoir to Rock Creek Powerhouse)
POLLUTANT:	PCBs
SOURCES:	None; no known data or evidence available
STATUS of Proposed 2008 303(d) LISTING:	Listed
CVRWQCB STAFF BASIS:	After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.
PG&E RECOMMENDATION:	<u>Do Not List</u>
PG&E COMMENT:	There are no known available PCB data from the North Fork Feather River (NFFR) Rock Creek Reach; consequently, there is no justification for listing this river segment for PCBs.

WATER SEGMENT:	North Fork Feather River – Cresta Reach (Cresta Reservoir to Cresta Powerhouse)
POLLUTANT:	PCBs
SOURCES:	None; no known data or evidence available
STATUS of Proposed 2008 303(d) LISTING:	Listed
CVRWQCB STAFF BASIS:	After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.
PG&E RECOMMENDATION:	<u>Do Not List</u>
PG&E COMMENT:	There are no known available PCB data from the North Fork Feather River (NFFR) Cresta Reach; consequently, there is no justification for listing this river segment for PCBs.

WATER SEGMENT: North Fork Feather River – Poe Reach (Poe Reservoir only)

POLLUTANT: PCBs

SOURCES: Source Unknown

**STATUS of Proposed
2008 303(d) LISTING:** Listed

**CVRWQCB
STAFF BASIS:** After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**PG&E
RECOMMENDATION:** List

PG&E COMMENT: Data from the Poe Reservoir specifically were collected in 2002 and 2003 by PG&E (PG&E 2003). Six of 12 samples analyzed for PCBs in fish tissue exceeded the OEHHA 2008 Fish Contaminant Goal (3.6 ppb) to protect human health (Klasing & Brodberg, 2008). Fish sampled include Sacramento sucker and smallmouth bass. All exceedances of the criterion were from the Sacramento suckers. This does exceed the allowable frequency listed in Table 3.1 of the SWRCB Listing Policy (SWRCB 2004).

References

Klasing, Susan & Brodberg, Robert. 2008. *Development of Fish Contaminant Goals and Advisory Tissue Levels for Common Contaminants in California Sport Fish: Chlordane, DDTs, Dieldrin, Methylmercury, PCBs, Selenium, and Toxaphene*. Pesticide and Environmental Toxicology Branch, Office of Environmental Health Hazard Assessment (OEHHA), California Environmental Protection Agency (Cal. EPA), June 2008.

PG&E. 2003. Poe Hydroelectric Project (FERC 2107), *Final Application for License for the Poe Project (FERC 2107)*. December 2003.

State Water Resources Control Board (SWRCB). 2004. *Water Quality Control Policy (Listing Policy) for Developing California's Clean Water Act Section 303(d) List*. September 2004.

WATER SEGMENT: North Fork Feather River – Big Bend Reach (Big Bend Reservoir only)

POLLUTANT: PCBs

SOURCES: Source Unknown

**STATUS of Proposed
2008 303(d) LISTING:** Listed

**CVRWQCB
STAFF BASIS:** After review of the available data and information, CVRWQCB staff concludes that the water body-pollutant combination should be placed on the section 303(d) list because applicable water quality standards are exceeded and a pollutant contributes to or causes the problem.

**PG&E
RECOMMENDATION:** List

PG&E COMMENT: Data were collected below Poe Powerhouse in Big Bend Reservoir in 2002 and 2003 (PG&E 2003) for PCB analysis in fish tissue. Analyzed fish included smallmouth bass, Sacramento sucker, and spotted bass (a total of 18 samples). Nine of the 18 fish (3 Sacramento suckers and 6 spotted bass) sampled exceeded the OEHHA 2008 criterion for PCBs for the protection of human health (Klasing & Brodberg, 2008). This exceeds the allowable frequency in Table 3.1 of the Listing Policy (SWRCB 2004).

References

Klasing, Susan & Brodberg, Robert. 2008. *Development of Fish Contaminant Goals and Advisory Tissue Levels for Common Contaminants in California Sport Fish: Chlordane, DDTs, Dieldrin, Methylmercury, PCBs, Selenium, and Toxaphene*. Pesticide and Environmental Toxicology Branch, Office of Environmental Health Hazard Assessment (OEHHA), California Environmental Protection Agency (Cal. EPA), June 2008.

PG&E. 2003. Poe Hydroelectric Project (FERC 2107), *Final Application for License for the Poe Project (FERC 2107)*. December 2003.

State Water Resources Control Board (SWRCB). 2004. *Water Quality Control Policy (Listing Policy) for Developing California's Clean Water Act Section 303(d) List*. September 2004.